



LEIB KNOTT GAYNOR

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April 20, 2018

Scott Rauscher
Loevy & Loevy
311 N. Aberdeen St., Third Floor
Chicago, IL 60607

Re: Terry v. Milwaukee County, et al.
Case No. 17-CV-1112

Dear Mr. Rauscher:

I am writing to communicate our efforts to produce documents responsive to your First Set of Requests for Production of Documents. We are attempting to provide documents to you as it is identified, located and available. As you know, we provided our fourth supplemental response to the request yesterday.

We are continuing our efforts with respect to your Request No. 13. As you know, many of the approximately 1400 pages we have previously produced fall within the scope of this request. We hope to provide the following by May 1.

- Medical-related vendor contracts;
- Medical personnel job descriptions;
- Roster of healthcare personnel (2009 to 2013);
 - Personnel files for healthcare staff (to the extent they are available to the County at this time);
- Any proposed healthcare budgets;
- NCCHC Audit Reports;
- State Inspection Reports;
- Quality Improvement Council documents.

With respect to your Request No. 14, our clients are generating a list of medical-related grievances from 2009 to the time Armor took over the medical care. We are trying to determine whether other grievances are available at this time and will advise.



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Thank you,

Very truly yours,

LEIB KNOTT GAYNOR LLC

A handwritten signature in blue ink, appearing to read "Douglas S. Knott". The signature is stylized, with the first name "Douglas" written in a cursive-like script and the last name "Knott" in a more blocky, capital-letter style.

Douglas S. Knott

DSK/csk